

Wells Fargo Objects to the disclosure of the following documents due to attorney client privilege work product

Baylon v. Wells Fargo et al.
1:12-CV-00052-WDS-KBM

WF Redacted Summary Spreadsheet - Documents for Production

Tab #	Bates #	Name of Doc/ Subject Line	Redactions by Wells Fargo Atty Client Privilege Work Product
1	000001	Email from Jordan to Jill and IDS/Does out to SM for 9/4 Sales	Entire Page
1	000002	Email from Betsy to IDS/P 2nd Set of Discovery	Entire Page
1	000022	Email from Stacy to Eric/Letter from OC	Entire Page
1	000023	Email from Stacy to Eric/Letter from OC Page 2	Entire Page
1	000024	Email from Eric to Betsy and IDS/ Letter from OC	Entire Page
1	000025	Email from Eric to Betsy and IDS/ Letter from OC Page 2	Entire Page
1	000026	Email from Stacy to IDS/ Vesting Information	Entire Page
1	000027	Vesting Information from LPS	Entire Page
1	000028	Email from Betsy to Stacy/Letter from OC	Entire Page
1	000030	Email from Angela to Special Master/ Sale Cancelled	Entire Page
1	000031	Email from Angela to WF/ Sale Date	Entire Page
1	000032	Email from Jordan to Jill and IDS/Sale Cancellations	Entire Page
1	000033	Email from Jordan to Jill and IDS/Sale Cancellations Page 2	Entire Page
1	000034	Email from Jordan to Jill and IDS/Sale Cancellations Page 3	Entire Page
1	000035	Email from Jordan to Special Master/Sale Cancellation	Entire Page
1	000036	Email from Jordan to Publisher/Cancel Publication	Entire Page
1	000037	Email from Angela to Publisher/NOS Publishing	Entire Page
1	000038	Email from Betsy to Donald/Note Returned	Entire Page
1	000039	Copy of Fed Ex US Air bill	Entire Page
1	000040	Letter to WF Regarding Returned Notes	Entire Page
1	000076	WF Ship Report	Entire Page
1	000077	WF Ship Report Page 2	Entire Page
1	000078	WF Request for Release of Documents	Entire Page
1	000079	Email from Angela to Publisher/NOS Publishing	Entire Page
1	000083	Email from Angela to Vlad/Drafting Sale Docs	Entire Page
1	000084	Email from Angela to Special Master/NOS	Entire Page
1	000085	Email from Stacy to CMHelp/Delete Fees	Entire Page
1	000086	Email from Stacy to IDS/Sale OTA Fees Doc	Entire Page
1	000087	Email from WF to Stacy/OTA Request	Entire Page
1	000088	Email from WF to Stacy/OTA Request Page 2	Entire Page
1	000089	Email from WF to Stacy/OTA Request Page 3	Entire Page

MH File No: NM12-1557



Wells Fargo Objects to the disclosure of the following documents due to attorney client privilege work product

Baylon v. Wells Fargo et al.
1:12-CV-00052-WDS-KBM

WF Redacted Summary Spreadsheet - Documents for Production

Tab #	Bates #	Name of Doc/ Subject Line	Redactions by Wells Fargo Atty Client Privilege Work Product
1	000090	Email from WF to Stacy/OTA Request Page 4	Entire Page
1	000091	Email from WF to Stacy/OTA Request Page 5	Entire Page
1	000092	Email from Angela to Vlad/Drafting NOS and NOFAP	Entire Page
1	000093	Email from Matt to Stacy/Review of Judgment Status	Entire Page
1	000094	Email from Matt to Stacy/Review of Judgment Status Page 2	Entire Page
1	000095	Email from Stacy to Eric/Judgment Status	Entire Page
1	000096	Email from Stacy to Eric/Judgment Status Page 2	Entire Page
1	000097	Email from Stacy to Angela/Judgment Status	Entire Page
1	000098	Email from Eric to Angela/Notice Requirements	Entire Page
1	000099	Email from Eric to Angela/Notice Requirements Page 2	Entire Page
1	000100	Email from Eric to Angela/Notice Requirements Page 3	Entire Page
1	000101	Email from Krystyna to Stacy/OTA Request for Discovery	Entire Page
1	000102	Additional Request Information Form	Entire Page
1	000103	Email from Stacy to Eric/File Ready for Sale	Entire Page
1	000104	Email from Stacy to Eric/File Ready for Sale Page 2	Entire Page
1	000105	Email from Stacy to Eric/File Ready for Sale Page 3	Entire Page
1	000120	Email from Stacy to IDS/Save End Stip Judgment	Entire Page
1	000128	Email from Stacy to IDS/Save Stip Judgment in Rem, Aff NMS, Cert of State of Record, Min for Entry of Stip Judgment In rem	Entire Page
1	000154	Email from Stacy to IDS/Save END Min for Entry of Stip Judgment in Rem	Entire Page
1	000157	Email from Stacy to IDS/Save File Cert of State of Record	Entire Page
1	000160	Email from Stacy to IDS/Save Filed End of Aff of NMS	Entire Page
1	000166	Email from Matt to Dave Scott/Plaintiff Counsel will Seek Default for M&H	Entire Page
1	000167	Email from Matt to Dave Scott/Plaintiff Counsel will Seek Default for M&H Page 2	Entire Page
1	000178	Email from Stacy to Court Clerk/Review and Issue Cert of State of Rec	Entire Page
1	000188	Email from Stacy to IDS/Save Non Military Aff	Entire Page
1	000191	Email from Stacy to IDS/Save Judgment In Rem Final	Entire Page
1	000199	Email from Stacy to IDS/Save Judgment In Rem	Entire Page
1	000206	Email from Stacy to IDS/Save NM Jfges	Entire Page
1	000207	Judgment Figures	Entire Page
1	000208	Judgment Figures Page 2	Entire Page

MH File No: NM12-1557

Wells Fargo Objects to the disclosure of the following documents due to attorney client privilege work product

Baylon v. Wells Fargo et al.
1:12-CV-00052-WDS-KBM

WF Redacted Summary Spreadsheet - Documents for Production

Tab #	Bates #	Name of Doc/ Subject Line	Redactions by Wells Fargo Atty Client Privilege Work Product
1	000209	Email from Stacy to IDS/Save NM Judgement Figures	Entire Page
1	000210	Judgment Figures	Entire Page
1	000211	Judgment Figures Page 2	Entire Page
1	000212	Email from Stacy to WF/figs Request	Entire Page
1	000213	Email from Krystyna to Stacy/MSI and Discovery Request	Entire Page
1	000214	Email from Krystyna to Stacy/MSI and Discovery Request Page 2	Entire Page
1	000215	Email from Krystyna to Stacy/MSI and Discovery Request	Entire Page
1	000216	Email from Stacy to Anne Marie/Delete Fees	Entire Page
1	000217	Email from Stacy to WF/Fup on OTA Request	Entire Page
1	000218	Email from Stacy to WF/Fup on OTA Request Page 2	Entire Page
1	000219	Request for Additional Fees Form	Entire Page
1	000220	Request for Additional Fees Form	Entire Page
1	000221	Email from Stacy to IDS/Save Proposed Slip Protective Order	Entire Page
1	000229	Email from Stacy to IDS/Save OC Letter	Entire Page
1	000239	Email from Emily to Ian Hicks/Send Docs Requested	Entire Page
1	000240	Email from Stacy to IDS/Save Response to 1st Discovery Requests	Entire Page
1	000264	Consolidated Notes Log	Below Dotted Line: Line 6, Line 11-17
1	000265	Consolidated Notes Log	Below Dotted Line: Lines 1-8, Lines 11-14
1	000300	Consolidated Notes Log	Below Dotted Line: Lines 15-17
1	000305	CPI On-Line Letter Writer Letter Log History File	Below Dotted Line: Line 1, Line 6, Line 15
1	000307	Letter Log Recap	Top Half: Line 1, Lines 6-7 / Bottom Half: Line 16
1	000308	Letter Log Recap	Line 16 Below Header
1	000311	Collections/Customer Service Loan Activity Archive	All Content Below Activity Description Header
1	000314	Collections/Customer Service Loan Activity Archive	Below 4th Dotted Line: Lines 4-6
1	000315	Collections/Customer Service Loan Activity Archive	Below Dotted Line: Lines 8-43, Lines 47-51
1	000316	Collections/Customer Service Loan Activity Archive	Below Dotted Line: Lines 6-17, Lines 25-36
1	000325	Collections/Customer Service Loan Activity Archive	Below Dotted Line: All Content
1	000368	Email from Stacy to WF/Fup on OTA Request	Entire Page
1	000370	Request for Additional Fees Form	Entire Page
1	000371	Request for Additional Fees Form	Entire Page
1	000372	Request for Additional Fees Form	Entire Page

MH File No: NM12-1557

Wells Fargo Objects to the disclosure of the following documents due to attorney client privilege work product

Baylon v. Wells Fargo et al.
1:12-CV-00052-WDS-KBM

WF Redacted Summary Spreadsheet - Documents for Production

Tab #	Bates #	Name of Doc/ Subject Line	Redactions by Wells Fargo Atty Client Privilege Work Product
1	000373	Email from Stacy to WF/OTA Request	Entire Page
1	000374	Request for Additional Fees Form	Entire Page
1	000375	Request for Additional Fees Form	Entire Page
1	000376	Email from Stacy to IDS/Save Payment History	Entire Page
1	000403	Email from Stacy to IDS/Save Letter Log 2011	Entire Page
1	000404	Letter Log Recap	Top Half: Line 1, Lines 6-7 / Bottom Half: Line 11, Line 16
1	000405	Email from Stacy to IDS/Save Notice of Hearing MTC	Entire Page
1	000409	Email from Stacy to IDS/Notice of Hearing	Entire Page
1	000415	Email from Stacy to Krystyna/Judgment	Entire Page
1	000416	Email from Stacy to Krystyna/Judgment Page 2	Entire Page
1	000417	Email from Stacy to IDS/Save Response to Def Motion	Entire Page
1	000420	Email from Stacy to IDS/Notice of Completion on Motion to Compel	Entire Page
1	000427	Email from Stacy to IDS/Save Plaintiffs Response to Def Motion to Compel	Entire Page
1	000430	Email from Stacy to IDS/Save Original Note	Entire Page
1	000465	WF Ship Report	Entire Page
1	000466q	WF Ship Report Page 2	Entire Page
1	000467	Request for Release of Documents	Entire Page
1	000468	Email from Stacy to IDS/Save Def Motion to Compel	Entire Page
1	000499	Email from Stacy to IDS/Save LM Affidavit	Entire Page
1	000502	Email from Stacy to IDS/Save Letter OC on Discovery	Entire Page
1	000504	Email from Emily to Evan/F/up on Original Note	Entire Page
1	000505	Email from Emily to Charles Parnall/Stipulated Judgment	Entire Page
1	000516	Email from Michael to Emily/Judgment Figures	Entire Page
1	000517	Email from Emily to WF/F/up on Jfigs Request	Entire Page
1	000518	Email from Traci to Emily/Executed LM Affidavit	Entire Page
1	000519	Email from Judicial Foreclosure to Stacy/Discovery Request	Entire Page
1	000520	Email from Krystyna to WF/Original Note Request	Entire Page
1	000521	Email from Krystyna to WF/OTA Request	Entire Page
1	000536	Email from Stacy to Team NM/BWR Answer	Entire Page
1	000541	Email from Stacy to Team NM/1st Discovery request	Entire Page
1	000552	Email from Stacy to IDS/Save NM Cert of Service	Entire Page

MH File No: NM12-1557

Wells Fargo Objects to the disclosure of the following documents due to attorney client privilege work product

Baylon v. Wells Fargo et al.
1:12-CV-00052-WDS-KBM

WF Redacted Summary Spreadsheet - Documents for Production

Tab #	Bates #	Name of Doc/ Subject Line	Redactions by Wells Fargo Atty Client Privilege Work Product
1	000534	Email from Krystyna to Sergiu/Draft Default Package	Entire Page
1	000555	Email from Krystyna to WF/LM Affidavit	Entire Page
1	000556	Cover Sheet	Entire Page
1	000559	Email from Klaudia to Krystyna/Service Completed	Entire Page
1	000560	Email from Martin Investigations to Judicial Foreclosure/MP Status	Entire Page
1	000561	Email from Martin Investigations to Judicial Foreclosure/MP Status Page 2	Entire Page
1	000562	Email from Martin Investigations to Judicial Foreclosure/Service	Entire Page
1	000563	Email from Martin Investigations to Judicial Foreclosure/Service Page 2	Entire Page
1	000564	Email from Judicial Foreclosure to Klaudia/Certified Mail	Entire Page
1	000565	Email from Judicial Foreclosure to Klaudia/Certified Mail Page 2	Entire Page
1	000566	Email from Judicial Foreclosure to Martin Investigations/Service	Entire Page
1	000567	Email from Martin Investigations to Judicial Foreclosure/Service Page 2	Entire Page
1	000568	Email from Martin Investigations to Judicial Foreclosure/Filed and Out for Service	Entire Page
1	000569	Email from Renee to IDS/Save Final Complaint Docs	Entire Page
1	000570	Cover Sheet	Entire Page
1	000584	Email from Renee to Team NM/Complaint Docs to Martin	Entire Page
1	000585	Check for Filing Fee	Entire Page
1	000586	Cover Sheet	Entire Page
1	000623	Email from Renee to Team NM/Complaint Docs to Martin	Entire Page
1	000624	Check for Filing Fee	Entire Page
1	000625	Cover Sheet	Entire Page
1	000663	Email from Michael to Renee/Complaint	Entire Page
1	000664	Email from Michael to Team NM/Exhibit	Entire Page
1	000665	Email from Michael to Check Request/Check Request	Entire Page
1	000666	Check Request Form	Entire Page
1	000667	Email from Michael to ap/Invoice	Entire Page
1	000668	Invoice	Entire Page
1	000669	Email from Michael to Cathi/Updated Title Report Request	Entire Page
1	000670	Invoice	Entire Page
1	000671	Email from Michael to Assignment Desk/AOM for Execution	Entire Page
1	000672	Email from Anne Marie to Assignment Team/AOM	Entire Page

MH File No: NM12-1557

Wells Fargo Objects to the disclosure of the following documents due to attorney client privilege work product

Baylon v. Wells Fargo et al.
1:12-CV-00052-WDS-KBM

WF Redacted Summary Spreadsheet - Documents for Production

Tab #	Bates #	Name of Doc/ Subject Line	Redactions by Wells Fargo Atty Client Privilege Work Product
1	000673	Assignment of Mortgage	Entire Page
1	000674	Email from James to WF/Preliminary Title Event	Entire Page
1	000675	Email from James to NM Team/Complete Complaint	Entire Page
1	000676	Email from Krystyna to WF/Title Clear	Entire Page
1	000677	Email from Krystyna to WF/BWR's Social Needed	Entire Page
1	000678	Email from Krystyna to ap/Title Order Invoice	Entire Page
1	000679	Invoice from Title Company	Entire Page
1	000680	Email from Krystyna to WF/Action in the Name of	Entire Page
1	000681	Email from James to WF/Vendor Instruction	Entire Page
1	000682	Vendor Instructions	Entire Page
1	000683	Vendor Instructions Page 2	Entire Page
1	000684	Vendor Instructions Page 3	Entire Page
1	000685	Email from James to ap/Title Search Invoice	Entire Page
1	000686	Invoice from Title Company	Entire Page
1	000687	Email from Andrei to Cathi/Title Order	Entire Page
1	000688	Email from Andrei to Cathi/Title Order	Entire Page
2	000689	Vesting Information from LPS	Entire Page
2	000692	Intercom from LPS	Entire Page
2	000730	WF Ship Report	Entire Page
2	000731	WF Ship Report Page 2	Entire Page
2	000732	Request for Release of Documents	Entire Page
2	000734	Email from WF to Anne Marie/Corporate Advance Breakdown	Entire Page
2	000735	Email from WF to Anne Marie/Judgment Date 10/21/11	Entire Page
2	000735	Email from WF to Anne Marie/Judgment Date 10/21/11 Page 2	Entire Page
2	000744	email from WF to Chris/Vendor Instructions	Entire Page
2	000745	Vendor Instructions	Entire Page
2	000746	Vendor Instructions Page 2	Entire Page
2	000747	Vendor Instructions Page 3	Entire Page
2	000750	Judgment Figures	Entire Page
2	000751	Judgment Figures Page 2	Entire Page
5	000856	MH Employee Task List	Entire Page

MH File No: NM12-1557

Wells Fargo Objects to the disclosure of the following documents due to attorney client privilege work product

Baylon v. Wells Fargo et al.
1:12-CV-00052-WDS-KBM

WF Redacted Summary Spreadsheet - Documents for Production

Tab #	Bates #	Name of Doc/ Subject Line	Redactions by Wells Fargo Atty Client Privilege Work Product
5	000857	MH Employee Task List Page 2	Entire Page
5	000858	MH Employee Task List Page 3	Entire Page

MH File No: NM12-1557